## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

JOHN RECONNU,	)	
Plaintiff,	)	
vs.	)	G N 2.10 GV 0600
	)	Case No. 3:10-CV-0688 Jury Demand (12)
SERVICE MANAGEMENT SYSTEMS, INC. and POWERS MANAGEMENT, LLC,	)	Judge Campbell  Magistrate Judge Griffin
Defendants.	)	

## DEFENDANT POWERS MANAGEMENT, LLC'S MOTION FOR SUMMARY JUDGMENT

Defendant Powers Management, LLC ("Powers"), pursuant to Rule 56 of the Federal Rules of Civil Procedure, moves this Court to enter summary judgment in its favor on all claims against it. As grounds for this Motion, Powers respectfully submits that there is no genuine issue of material fact and that therefore it is entitled to judgment as a matter of law on all claims asserted against it. A memorandum of law in support of this motion for summary judgment is filed concurrently herewith. Additionally, Powers incorporates by reference and adopts all arguments set forth by Service Management Systems, Inc. in its Motion for Summary Judgment (Docket No. 24) and Memorandum in Support thereof (Docket No. 26). Powers also files the following in support of this Motion:

- 1. Statement of Undisputed Material Facts;
- 2. Appendix of unreported cases in support of the motion for summary judgment;
- 3. Deposition of John Reconnu, Volumes I and II; and

## 4. Deposition of Michelle Kennedy.

Respectfully submitted,

s/Ben H. Bodzy
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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of June 2011, a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system:

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